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*Attorneys for BNP Paribas S.A., BNP Paribas  
(Suisse) S.A., BNP Paribas Arbitrage SNC, BNP  
Paribas Bank & Trust (Canada), BNP Paribas  
Bank & Trust Cayman Limited, BGL BNP  
Paribas Luxembourg S.A., BNP Paribas  
Securities Services – Succursale de Luxembourg,  
and BNP Paribas Securities Services S.A.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION CORPORATION, : Adv. Pro. No. 08-01789 (BRL)

Plaintiff-Applicant, : :

v. : SIPA Liquidation

BERNARD L. MADOFF :  
INVESTMENT SECURITIES LLC, :

Defendant. : (Substantively Consolidated)

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IRVING H. PICARD, Trustee for the Liquidation of :  
Bernard L. Madoff Investment Securities LLC, : Adv. Pro. No. 12-01576 (BRL)

Plaintiff, :

v. : **ORAL ARGUMENT  
REQUESTED**

BNP PARIBAS S.A., et al., :

Defendants. :

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**NOTICE OF MOTION OF THE BNPP DEFENDANTS  
FOR AN ORDER WITHDRAWING THE REFERENCE  
TO THE BANKRUPTCY COURT**

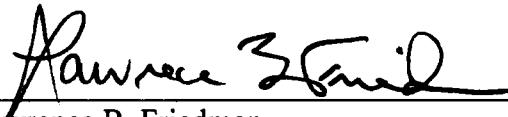
PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure and Rule 5011-1 of the Local Rules of the Bankruptcy Court, and upon the Declaration of Jamie Rietema, dated July 26, 2012, the attached exhibit, and the accompanying Memorandum of Law, dated July 26, 2012, defendants BNP Paribas S.A., BNP Paribas (Suisse) S.A., Individually and as Successor in Interest to BNP Paribas Private Bank (Switzerland) S.A. and as Successor in Interest to United European Bank, BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust (Canada), BNP Paribas Bank & Trust Cayman Limited, BGL BNP Paribas Luxembourg S.A., as Successor in Interest to BNP Paribas Luxembourg S.A., BNP Paribas Securities Services—Succursale de Luxembourg, and BNP Paribas Securities Services S.A. (collectively, “the BNPP Defendants”), by and through their undersigned attorneys, hereby move the Court for an order withdrawing the reference of this action to the Bankruptcy Court for the Southern District of New York.

The BNPP Defendants have made no previous request for the relief request by this motion.

The BNPP Defendants respectfully request oral argument on this motion.

Dated: July 26, 2012  
New York, New York

CLEARY GOTTLIEB STEEN & HAMILTON LLP

By:   
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